

These are reply comments to Wireless Bureau Document 01-309, RM-8658 in re Hearing Aid Compatibility

Due to the large number of comments and the lengthy ones submitted by the various parts of the telephone industry I have not had the time to read them all but the following seems to sum up the comments:

The telephone industry presents lengthy but not entirely valid reasons for the FCC not to revoke the exemption of wireless telephones from the HAC ACT of 1988 but most infer, correctly, that the hearing aid industry must do its part to make the telephones useable but do not discuss the interference caused by the strong magnetic flux generated by the varying battery current of the digital telephones which is easily and inexpensively lessened by methods discussed in my original comments to this NPRM.

Consumers and organizations of persons with hearing loss favor revoking the exemption of the wireless telephones from the HAC Act of 1988, hoping that such action may force cooperation between the Hearing Industries Association and the Telecommunications Industries Association.

NONE, however, of the comments by either suggest that there are solutions which make digital cellular telephones useable by most hearing aid wearers that would be inexpensive and practical to incorporate. It has been pointed out by the telephone industry, correctly, that the RF pickup by the hearing aids electronics must be solved. In spite of reports that shielding is ineffective, this commenter has not been able to determine whether or not a vitally necessary connection was made from the shield to the hearing aids electronics. Experiments conducted using shielding and this connection resulted in no interference to an analog hearing aid in the microphone mode even when used with a GSM "candy bar type" cellular telephone.

The telephone industry must, in addition, to providing the required magnetic coupling of the telephone's audio signal, eliminate or lessen to the extent that it is not heard, the magnetic flux generated by the varying battery current that is picked up by the telecoil in the hearing aid. As described in my comments to the NPRM this can be accomplished inexpensively and easily, by redesign of the battery and its connection to the telephone's electronics.

If all hearing aids were made immune to RF pickup and the undesired magnetic flux eliminated or lessened in all telephones, all hearing aids would be useable with all telephones and removal of the antenna and battery from the vicinity as done in the clam type of telephone. I believe that my experiments show that this is not only possible but practical, achievable, and inexpensive!

Sincerely,

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